IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

STINGRAY IP SOLUTIONS LLC, Plaintiff, v. VIVINT, INC. Defendant.	Civil Action No. 2:23-cv-00503-JRG-RSP **LEAD CASE**
STINGRAY IP SOLUTIONS LLC, Plaintiff, v. LEEDARSON IOT TECHNOLOGY, INC. *et al.*, Defendants.	Civil Action No. 2:23-cv-00499-JRG-RSP **MEMBER CASE**

EXHIBIT B

DEFENDANTS' CLAIM CONSTRUCTION CHART

Exhibit B

Patent / Claim	Term	Defendants' Proposed Construction	Defendants' Supporting Evidence
U.S. 7,224,678 / Claim 51	(preamble) "An intrusion detection method for a wireless local or metropolitan area network comprising a plurality of stations, the method comprising"	The preamble is limiting.	'678 Patent at FIGS. 1-10, Title, Abstract, 1:8-10, 1:14-21, 1:24-1:49, 2:25-48, 2:58-67, 3:28-30, 4:11-51, 5:45-53, 6:8-22, 6:38-39, 6:45-67, 7:7-14, 7:22-34, 7:46-50, 7:56-65, 8:5-6, 8:13-23, 8:54-58, 10:33-38; 10:60-67; Claim 51 Prosecution History and references cited therein, including: Prosecution History, Supplemental Appeal Br. dated October 31, 2005 Microsoft Computer Dictionary, *LAN*, *MAN*, *station*, *Wireless LAN*, Fifth Edition (2002) (LEED_0046319, LEED_0046321 — LEED_0046322, LEED_0046324— LEED_0046325) Merriam Webster's Collegiate Dictionary, *plural, plurality*, Tenth Edition (1997) (LEED_0045031) Any additional evidence relied on by Plaintiff.
U.S. 7,224,678 / Claim 51	"generating an intrusion alert"	Generating a notification sent by the policing node(s) upon detecting an attempted intrusion	'678 Patent at Abstract, Figure 2, Figure 12; 1:26-44, 2:49-57, 3:22-27. 3:38-45, 5:35-44, 5:45-6:7, 6:8-31, 6:32-44, 6:45-60; 7:21-28, 9:13-23, 9:54-67, 10:60-67, 12:37-55. Prosecution History and references cited therein, including: Prosecution History, Supplemental Appeal Br. dated October 31, 2005 Encyclopedia of Technology Terms, Que Publishing, *intrusion detection*, (2002) (LEED_0046379) U.S. 7,082,117 (LEED_0046353— LEED_0046374)

			Declaration of Dr. Akl Any additional evidence relied on by Plaintiff.
U.S. 7,616,961 / Claim 1	(preamble) "A method for dynamic channel allocation in a mobile ad hoc network comprising a plurality of wireless mobile nodes and a plurality of wireless communication links connecting the plurality of wireless mobile nodes together over a plurality of separate channels at different frequencies, the method comprising"	The preamble is limiting.	'961 Patent at Abstract; 1:6-8; 1:12-23; 1:24-34; 1:35-50; 2:51-67; 3:29-44; 5:4-21; 8:14-25; 13:33-14:55; Figure 1; Figure 2; Figure 3; Figure 4; Figure 5; Figure 6; Figure 7; Figure 15; Figure 16; Figure 17 <u>Prosecution History and references cited therein, including:</u> Reply to Office Action dated March 16, 2005 Reply to Office Action dated March 17, 2006 Appeal Brief dated July 5, 2006 Reply to Office Action dated January 30, 2007 Reply to Office Action dated May 8, 2007 Appeal Brief dated August 13, 2007 Decision on Appeal dated April 28, 2009 Reply to Office Action dated June 30, 2009 U.S. Patent No. 6,850,532 (LEED_0046416—LEED_0046425) U.S. Patent No. 6,961,310 (LEED_0046381—LEED_0046392) Academic Press Dictionary of Science and Technology, *ad hoc*, (1992) (LEED_0045023) Merriam Webster's Collegiate Dictionary, *ad hoc*, *mobile*, *plural, plurality*, Tenth Edition (1997) (LEED_0045029— LEED_0045031) Webster's New World Dictionary of Computer Terms, *node*, Sixth Edition (1997) (LEED_0045632) Microsoft Computer Dictionary, *ad-hoc network*, *node*, Fifth Edition (2002) (LEED_0046315, LEED_0046323) The American Heritage College Dictionary, *mobile*, Second Edition (1985) (LEED_0045054)

			IEEE 100, The Authoritative Dictionary of IEEE Standards Terms, *ad hoc network*, Seventh Edition (2000) (LEED_0045051) Sanket Nesargi and Ravi Prakash, *MANETconf: Configuration of Hosts in a Mobile Ad Hoc Network* (LEED_0046343— LEED_0046352) Ericsson Review No. 4, Wireless ad hoc networking – The art of networking without a network (2000) (LEED_0045067— LEED_0045082) IEEE 802.11 (1999) (LEED_0045083— LEED_0045610) IEEE 802.15.4 (2003) (LEED_0045633— LEED_0046311) RFC 2501, Mobile Ad hoc Networking (MANET): Routing Protocol Performance Issues and Evaluation Considerations (1999) (LEED_0045055— LEED_0045066) RFC 2290, Mobile-IPv4 Configuration Option for PPP IPCP (1998) (LEED_0046326— LEED_0046342) *Stingray IP Solutions, LLC v. Legrand et al.*, Case No. 2:21-cv-00202-JRG, Dkt. No. 95 (Claim Construction Memorandum Opinion and Order of Judge Gilstrap, dated April 14, 2022), available at https://ecf.txed.uscourts.gov/doc1/175112458385 (LEED_0046393— LEED_0046415) Any additional evidence relied on by Plaintiff.
U.S. 7,616,961 / Claim 1	"mobile ad hoc network"	a network, including a number of geographically-distributed mobile nodes wirelessly connected by	'961 Patent at Abstract; 1:12-23; 1:24-34; 1:35-50; 1:13-2:42, 2:52-55; 2:56-67; 2:29-44; 5:4-21; 8:62-65, 10:5-23, 13:33-14:55; Figure 1; Figure 15; Figure 16; Figure 17; Figure 18 <u>Prosecution History and references cited therein, including:</u> Reply to Office Action dated March 16, 2005

		one or more radio frequency channels, which lacks fixed infrastructure such that the nodes must self-organize and reconfigure as they move, join, or leave the network	Reply to Office Action dated March 17, 2006 Appeal Brief dated July 5, 2006 Reply to Office Action dated January 30, 2007 Reply to Office Action dated May 8, 2007 Appeal Brief dated August 13, 2007 Decision on Appeal dated April 28, 2009 Reply to Office Action dated June 30, 2009 U.S. Patent No. 6,850,532 (LEED_0046416—LEED_0046425) U.S. Patent No. 6,961,310 (LEED_0046381—LEED_0046392) Academic Press Dictionary of Science and Technology, *ad hoc*, (1992) (LEED_0045023) Merriam Webster's Collegiate Dictionary, *ad hoc*, *mobile* Tenth Edition (1997) (LEED_0045029— LEED_0045030) IEEE 100, The Authoritative Dictionary of IEEE Standards Terms, *ad hoc network*, Seventh Edition (2000) (LEED_0045051) Microsoft Computer Dictionary, *ad-hoc network*, Fifth Edition (2002) (LEED_0046315, LEED_0046323) The American Heritage College Dictionary, *mobile*, Second Edition (1985) (LEED_0045054) Sanket Nesargi and Ravi Prakash, *MANETconf: Configuration of Hosts in a Mobile Ad Hoc Network* (LEED_0046343— LEED_0046352) Ericsson Review No. 4, Wireless ad hoc networking – The art of networking without a network (2000) (LEED_0045067—LEED_0045082) IEEE 802.11 (1999) (LEED_0045083—LEED_0045610) IEEE 802.15.4 (2003) (LEED_0045633—LEED_0046311)

			RFC 2501, Mobile Ad hoc Networking (MANET): Routing Protocol Performance Issues and Evaluation Considerations (1999) (LEED_0045055— LEED_0045066) RFC 2290, Mobile-IPv4 Configuration Option for PPP IPCP (1998) (LEED_0046326— LEED_0046342) Declaration of Dr. Akl Any additional evidence relied on by Plaintiff.
U.S. 7,616,961 / Claim 1	"each node"	At each of the wireless mobile nodes in the mobile ad hoc network	'961 Patent at Abstract; 1:12-23; 1:24-34; 1:35-50; 1:13-2:42, 2:52-55; 2:56-67; 2:29-44; 5:4-21; 8:18-23, 8:56-9:23, 10:5-23, 13:33-14:55; Figure 1; Figure 15; Figure 16; Figure 17; Figure 18; Claims 1, 3, 5-7 <u>Prosecution History and references cited therein, including:</u> Reply to Office Action dated March 16, 2005 Reply to Office Action dated March 17, 2006 Appeal Brief dated July 5, 2006 Reply to Office Action dated January 30, 2007 Reply to Office Action dated May 8, 2007 Appeal Brief dated August 13, 2007 Decision on Appeal dated April 28, 2009 Reply to Office Action dated June 30, 2009 Any additional evidence relied on by Plaintiff.
U.S. 7,440,572 / Claim 1	(preamble) "A secure wireless local area network (LAN) device comprising"	The preamble is limiting.	'572 Patent at Title, Abstract; 1:11-16, 1:64-67, 2:1-19; 2:27-35; 2:36-39; 2:44-55; 2:59-3:22, 3:37-39, 4:14-19; 4:20-31; 5:20-25; 5:53-67; 5:65-6:10; 6:11-17; 6:40-41, 6:65-7:12; 7:19-34; Figure 7; Figure 8; Figure 9, claim 1 <u>Prosecution History and references cited therein, including:</u> Reply to Office Action dated September 27, 2005 Reply to Office Action dated February 27, 2006 Advisory Action dated March 22, 2006 Appeal Brief dated June 13, 2006

			Appeal Brief dated October 4, 2006 Appeal Brief dated January 28, 2007 Appeal Brief dated May 1, 2007 Reply to Office Action dated November 15, 2007 Reply to Office Action dated May 23, 2008 Microsoft Computer Dictionary, *LAN*, *Wireless LAN,* Fifth Edition (2002) (LEED_0046319, LEED_0046324) U.S. Patent No. 7,441,126 (LEED_0045032—LEED_0045047) Any additional evidence relied on by Plaintiff.
U.S. 7,440,572 / Claim 1	"cryptography circuit carried by said housing and connected to said MAC and said wireless transceiver for encrypting both address and data information for transmission by at least adding a plurality of encrypting bits to both the address and the data information, and for decrypting both the address and the data information	Governed by Pre-AIA 35 U.S.C. 112 Paragraph 6 **Function**: encrypting both address and data information for transmission by at least adding a plurality of encrypting bits to both the address and the data information, and for decrypting both the address and the data information upon reception	'572 Patent at Abstract; 1:46-54; 2:1-19; 2:27-35; 2:36-39; 2:44-55; 4:14-19; 4:20-31; 5:20-30; 5:54-64; 5:65-6:10; 6:11-17; 6:65-7:12; 7:19-34; Figure 7; Figure 8; Figure 9; Figure 10; Claim 1 <u>Prosecution History and references cited therein, including:</u> Reply to Office Action dated September 27, 2005 Reply to Office Action dated February 27, 2006 Advisory Action dated March 22, 2006 Appeal Brief dated June 13, 2006 Appeal Brief dated October 4, 2006 Appeal Brief dated January 28, 2007 Appeal Brief dated May 1, 2007 Reply to Office Action dated November 15, 2007 Reply to Office Action dated May 23, 2008 U.S. Patent No. 7,441,126 (LEED_0045032—LEED_0045047) Declaration of Dr. Akl Any additional evidence relied on by Plaintiff.

	upon reception"	**Structure:** Indefinite for lack of corresponding structure.	
U.S. 7,440,572 / Claim 1	"cryptography circuit"	In the alternative, if the Court does not find the above governed by Pre-AIA 35 U.S.C. 112 Paragraph 6: Hardware employing an algorithm and a cryptographic key and capable of encrypting and decrypting both address and data information for transmission	'572 Patent at Abstract; 1:46-54; 2:1-19; 2:27-35; 2:36-39; 2:44-55; 4:14-41; 5:15-19; 5:20-30; 5:53-65; 5:65-6:10; 6:11- 17; 6:29-39; 6:40-55; 6:65-7:12; 7:19-34; Figure 7; Figure 8; Figure 9; Figure 10; Figure 12; Figure 13; Claims 1, 8, 11, 14, 20, 23, 26, 32, 35, 38, 42, 57 <u>Prosecution History and references cited therein, including:</u> Reply to Office Action dated September 27, 2005 Reply to Office Action dated February 27, 2006 Advisory Action dated March 22, 2006 Appeal Brief dated June 13, 2006 Appeal Brief dated October 4, 2006 Appeal Brief dated January 28, 2007 Appeal Brief dated May 1, 2007 Reply to Office Action dated November 15, 2007 Reply to Office Action dated May 23, 2008 Microsoft Computer Dictionary, *cryptography*, Fifth Edition (2002) (LEED_0046316) Declaration of Dr. Akl Any additional evidence relied on by Plaintiff.
U.S. 7,440,572 / Claim 1	"encrypting both address and data information for transmission by at least adding a plurality of encrypting bits to both the address and the	Indefinite *If not indefinite, it should be construed as:* encrypting both MAC address and MAC data	'572 Patent at Abstract; 1:46-55; 2:1-19; 2:32-35; 2:46-55; 3:58-64; 4:14-19; 4:20-31; 5:20-45; 5:55-58, 6:18-20; 6:29-39; Figure 7; Figure 8; claim 1 <u>Prosecution History and references cited therein, including:</u> Reply to Office Action dated September 27, 2005 Reply to Office Action dated February 27, 2006

	data information"	information by at least adding a plurality of encrypting bits to both the address and the data information	Advisory Action dated March 22, 2006 Appeal Brief dated June 13, 2006 Appeal Brief dated October 4, 2006 Appeal Brief dated January 28, 2007 Appeal Brief dated May 1, 2007 Reply to Office Action dated November 15, 2007 Reply to Office Action dated May 23, 2008 Microsoft Computer Dictionary, *encryption*, Fifth Edition (2002) (LEED_0046318) Encyclopedia of Technology Terms, Que Publishing, *encryption*, (2002) (LEED_0046378) Academic Press Dictionary of Science and Technology, *encryption*, (1992) (LEED_0045025) U.S. Patent No. 7,441,126 (LEED_0045032—LEED_0045047) Declaration of Dr. Akl Any additional evidence relied on by Plaintiff.
U.S. 7,440,572 / Claim 1	"decrypting both address and data information upon reception"	recovering, upon reception, both the MAC address and the MAC data information that was encrypted	'572 Patent at Abstract; 1:46-55; 2:1-19; 2:46-55; 3:58-64; 4:14-19; 4:20-31; 5:20-41; 5:55-58; 6:18-20; 6:29-39; Figure 7; Figure 8; claim 1 <u>Prosecution History and references cited therein, including:</u> Reply to Office Action dated September 27, 2005 Reply to Office Action dated February 27, 2006 Advisory Action dated March 22, 2006 Appeal Brief dated June 13, 2006 Appeal Brief dated October 4, 2006 Appeal Brief dated January 28, 2007 Appeal Brief dated May 1, 2007 Reply to Office Action dated November 15, 2007 Reply to Office Action dated May 23, 2008

			Microsoft Computer Dictionary, *decryption*, Fifth Edition (2002) (LEED_0046317) Encyclopedia of Technology Terms, Que Publishing, decryption, (2002) (LEED_0046377) Academic Press Dictionary of Science and Technology, *decryption*, (1992) (LEED_0045024) U.S. Patent No. 7,441,126 (LEED_0045032—LEED_0045047) Declaration of Dr. Akl Any additional evidence relied on by Plaintiff.
U.S. 7,440,572 / Claim 1	"medium access controller (MAC)"	Indefinite	'572 Patent at Abstract, 2:20-26, 2:27-32, 4:14-18, 4:32-42, 5:26-30, Fig. 7, claim 1; <u>Prosecution History and references cited therein, including:</u> Reply to Office Action dated September 27, 2005 Reply to Office Action dated February 27, 2006 Advisory Action dated March 22, 2006 Appeal Brief dated June 13, 2006 Appeal Brief dated October 4, 2006 Appeal Brief dated January 28, 2007 Appeal Brief dated May 1, 2007 Reply to Office Action dated November 15, 2007 Reply to Office Action dated May 23, 2008 U.S. Patent No. 7,441,126 (LEED_0045032—LEED_0045047) Microsoft Computer Dictionary, *MAC*, Fifth Edition (2002) (LEED_0046320) Any additional evidence relied on by Plaintiff.
U.S. 7,441,126 / Claim 1	(preamble) "A secure wireless local area network	The preamble is limiting.	'126 Patent at Title, Abstract, 1:13-18, 2:7-10, 2:11-15, 2:39-48, 3:51-53, 5:66-67, 6:11-15, 6:52-54, 7:9-11, 7:29-32, claims 1, 3-6;

	(LAN) device comprising:"		Prosecution History and references cited therein, including: Reply to Office Action dated November 22, 2004 Reply to Office Action dated November 21, 2005 Appeal Brief dated March 17, 2006 Reply Appeal Brief dated July 21, 2006 Patent Board Decision dated March 4, 2008 Microsoft Computer Dictionary, *LAN*, *Wireless LAN,* Fifth Edition (2002) (LEED_0046319, LEED_0046324) U.S. 7,440,572 (LEED_0045611—LEED_0045628) Any additional evidence relied on by Plaintiff.
U.S. 7,441,126 / Claim 1	"a media access controller (MAC) carried by said housing"	Indefinite	'126 Patent at Abstract, 2:38-43, 2:48-51, 4:28-33, 4:45-55, 5:39-43, Fig. 7, claim 1; Prosecution History and references cited therein, including: Reply to Office Action dated November 22, 2004 Reply to Office Action dated November 21, 2005 Appeal Brief dated March 17, 2006 Reply Appeal Brief dated July 21, 2006 Patent Board Decision dated March 4, 2008 Microsoft Computer Dictionary, *MAC*, Fifth Edition (2002) (LEED_0046320) U.S. 7,440,572 (LEED_0045611—LEED_0045628) Any additional evidence relied on by Plaintiff.
U.S. 7,441,126 / Claim 1	"a cryptography circuit carried by said housing and connected to	Hardware employing an algorithm and a cryptographic key and	'126 Patent at Abstract; 2:11-23; 2:24-33; 2:48-56; 2:63-67; 4:28-33; 4:34-44; 4:45-55; 5:18-32; 5:33-38; 5:66-6:10; 6:11-6:22; 6:23-29; 6:41-51; 6:52-67; 7:6-23; 7:29-43; Figure 7; Figure 8; Figure 9; Figure 12; Figure 13; Claims 1, 7

	said MAC and said wireless transceiver"	capable of encrypting and decrypting both address and data information for transmission	Prosecution History and references cited therein, including: Reply to Office Action dated November 22, 2004 Reply to Office Action dated November 21, 2005 Appeal Brief dated March 17, 2006 Reply Appeal Brief dated July 21, 2006 Patent Board Decision dated March 4, 2008 Microsoft Computer Dictionary, *cryptography*, Fifth Edition (2002) (LEED_0046316) U.S. 7,440,572 (LEED_0045611—LEED_0045628) Declaration of Dr. Akl Any additional evidence relied on by Plaintiff.
U.S. 7,441,126 / Claim 4	"said security information"	Indefinite	'126 Patent at Abstract; 2:11-23; 2:24-33; 2:57-3:2; 7:9-23; 7:24-28; 7:29-44; Claims 1, 3, 4 Prosecution History and references cited therein, including: Reply to Office Action dated November 22, 2004 Reply to Office Action dated November 21, 2005 Appeal Brief dated March 17, 2006 Reply Appeal Brief dated July 21, 2006 Patent Board Decision dated March 4, 2008 Any additional evidence relied on by Plaintiff.